

To: Leibovitz, Henry (RIDOH) [Ex. 6 - Personal Privacy]; Hall, Bill [Ex. 6 - Personal Privacy]
DiMattei, Steve [DiMattei.Steve@epa.gov]; Jones, Dermot [Ex. 6 - Personal Privacy]; Touet, Lisa
(DEP) [Ex. 6 - Personal Privacy]; Jamison, Jennifer [Ex. 6 - Personal Privacy]
Cc: [Ex. 6 - Personal Privacy]; Kotuli, Jenna
(DEP) [Ex. 6 - Personal Privacy]; Schlossberg, Philip [Ex. 6 - Personal Privacy]
[Ex. 6 - Personal Privacy]; Kwong, Ellie [kwong.ellie@epa.gov]; Jefferies,
Ann [jefferies.ann@epa.gov]
From: Mills, George
Sent: Tue 12/5/2017 2:19:36 PM
Subject: 537

Hi all, thank you for responses. FYI - My conclusion was essentially to stick with 537. I told the lab: I am know that EPA recommends 537 for drinking water (unregulated contaminants) but do not know of the ISO method being reviewed by EPA – so I do not think we would certify the method. I had not read the information Henry sent today which reinforces my decision. thanks.
George

William George Mills, Inorganic Program Chief and Laboratory Certification Officer,
Vermont Department of Health Laboratory. [Ex. 6 - Personal Privacy]

Mailing Address: P O Box 1125, Burlington, VT 05402.

Physical Address: 359 South Park Drive, Colchester, VT 05446. Phone number: 802-338-4746

From: Leibovitz, Henry (RIDOH) [mailto:Henry.Leibovitz@health.ri.gov]
Sent: Tuesday, December 05, 2017 8:56 AM
To: Hall, Bill <George.Hall@des.nh.gov>; DiMattei, Steve <DiMattei.Steve@epa.gov>; Mills, George <George.Mills@vermont.gov>; Jones, Dermot <Dermot.Jones@ct.gov>; 'Touet, Lisa (DEP)' <Lisa.Touet@MassMail.State.MA.US>; Jamison, Jennifer <Jennifer.Jamison@maine.gov>

Cc: **Ex. 6 - Personal Privacy**
Philip <**Ex. 6 - Personal Privacy**>; Croteau, Tyler <**Ex. 6 - Personal Privacy**>; Kwong, Ellie <kwong.ellie@epa.gov>; Jefferies, Ann <jefferies.ann@epa.gov>
Subject: RE: [EXTERNAL] : Re: NECO Conference Call Thursday October 19th

RI will begin accrediting for PFAS in DW in 2018. Since PFAS testing is no longer under UCMR3 there is no “approved method”.

Here is an excerpt from FAQ on the EPA page <https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos>

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Must EPA Method 537 be used to analyze drinking water samples, outside the scope of UCMR 3, for PFOA and PFOS?

EPA’s Unregulated Contaminant Monitoring Rule (UCMR 3) required that Method 537 be used to analyze UCMR 3 samples for PFOA, PFOS, and four other PFASs. With the exception of a small number of public water systems (PWSs) that are carrying out repeat/delayed UCMR 3 sample collection in 2016, UCMR 3 monitoring is complete. Those who are now monitoring for PFOA/PFOS in drinking water are generally doing so outside the scope of UCMR 3. As such, EPA’s drinking water program does not have any particular requirements (including a method specification) for the “non-UCMR” monitoring.

For the following reasons, EPA has a degree of familiarity with (and confidence in) Method 537: it was developed with particular attention to potential for interference; it has been through multi-lab validation; and it was used to support analysis of samples from approximately 5000 PWSs under UCMR 3. Other methods may be appropriate for the analysis of PFASs in drinking water but they have not been evaluated by EPA’s Office of Water. Those considering alternative methods should consider the degree to which method performance has been evaluated and documented, as well as the degree to which the method capabilities align with data quality objectives.

From: Hall, Bill [mailto:**Ex. 6 - Personal Privacy**]

Sent: Thursday, November 30, 2017 4:47 PM

To: DiMattei, Steve <DiMattei.Steve@epa.gov>; Mills, George <[Ex. 6 - Personal Privacy] >; Jones, Dermot <[Ex. 6 - Personal Privacy] >; 'Touet, Lisa (DEP)'

<[Ex. 6 - Personal Privacy] >; Jamison, Jennifer <[Ex. 6 - Personal Privacy] >

Cc: <[Ex. 6 - Personal Privacy] > Kotuli, Jenna (DEP) <[Ex. 6 - Personal Privacy] > Leibovitz, Henry (RIDOH) <[Ex. 6 - Personal Privacy] >; Schlossberg, Philip

<[Ex. 6 - Personal Privacy] >; Croteau, Tyler <[Ex. 6 - Personal Privacy] > Kwong, Ellie <kwong.ellie@epa.gov>; Jefferies, Ann <jefferies.ann@epa.gov>

Subject: [EXTERNAL] : Re: NECO Conference Call Thursday October 19th

It is EPA 537.1 that is approved for DW?

From: DiMattei, Steve <DiMattei.Steve@epa.gov>

Sent: Thursday, November 30, 2017 11:54 AM

To: Mills, George; Jones, Dermot; Hall, Bill; 'Touet, Lisa (DEP)'; Jamison, Jennifer

Cc: <[Ex. 6 - Personal Privacy] > Kotuli, Jenna (DEP) <[Ex. 6 - Personal Privacy] >

Schlossberg, Philip; Croteau, Tyler; Kwong, Ellie; Jefferies, Ann

Subject: RE: NECO Conference Call Thursday October 19th

George,

As far as I know, only 537.1 is approved for **drinking water**.

Stephen DiMattei

USEPA Region 1 – OEME/EQA

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From: Mills, George [mailto:**Ex. 6 - Personal Privacy**]
Sent: Thursday, November 30, 2017, 11:22 AM
To: Jones, Dermot <**Ex. 6 - Personal Privacy**>; Hall, Bill <**Ex. 6 - Personal Privacy**>; 'Touet, Lisa (DEP)' <**Ex. 6 - Personal Privacy**>; DiMattei, Steve <DiMattei.Steve@epa.gov>; Jamison, Jennifer <Jennifer.Jamison@maine.gov>
Cc: **Ex. 6 - Personal Privacy**; Kotuli, Jenna (DEP) <**Ex. 6 - Personal Privacy**>; **Ex. 6 - Personal Privacy**; Schlossberg, Philip <**Ex. 6 - Personal Privacy**>; **Ex. 6 - Personal Privacy**; Kwong, Ellie <kwong.ellie@epa.gov>; Jefferies, Ann <jefferies.ann@epa.gov>
Subject: RE: NECO Conference Call Thursday October 19th

Hi all, is any of your states certifying for method ISO-25101, in Drinking Water? I have only certified for 537 for a few labs.

Perfluorinated Compounds by ISO-25101 (isotope dilution)?

Thanks, George

William George Mills, Inorganic Program Chief and Laboratory Certification Officer,
Vermont Department of Health Laboratory. **Ex. 6 - Personal Privacy**

Mailing Address: P O Box 1125, Burlington, VT 05402.

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338-4746

From: Jones, Dermot **Ex. 6 - Personal Privacy**
Sent: Tuesday, October 17, 2017 10:48 AM
To: Hall, Bill <**Ex. 6 - Personal Privacy**>; 'Touet, Lisa (DEP)'
Ex. 6 - Personal Privacy <**Ex. 6 - Personal Privacy**>; DiMattei, Steve <DiMattei.Steve@epa.gov>; Jamison, Jennifer <**Ex. 6 - Personal Privacy**>
Cc: **Ex. 6 - Personal Privacy**; Kotuli, Jenna (DEP) **Ex. 6 - Personal Privacy**; Schlossberg, Philip <**Ex. 6 - Personal Privacy**>; Croteau, Tyler **Ex. 6 - Personal Privacy**; Mills, George <**Ex. 6 - Personal Privacy**>; Kwong, Ellie <kwong.ellie@epa.gov>; Jefferies, Ann <jefferies.ann@epa.gov>
Subject: RE: NECO Conference Call Thursday October 19th

Besides the 300 method there are 4 or 5 other methods that call for 6 month MDLs (one is an automated CN method 335.4)

It seems to be a lot of futlity in doing this QC 2X per year and we have been incorporating the TNI aspects of LOD and LOQ as more useful

We have found that most out-of-state labs we register only provide MDL results every 2 years when they renew with us

From: Hall, Bill **Ex. 6 - Personal Privacy**
Sent: Tuesday, October 17, 2017 9:56 AM

Ex. 6 - Personal Privacy

Subject: RE: NECO Conference Call Thursday October 19th

What does it mean by... “some” approved procedures use these terms interchangeably? Which ones?

Technical Notes (cont. p10)...

“Analytical methods for drinking water are written to be prescriptive enough to provide uniformity of data quality, and flexible enough to allow analysts to exercise judgement, skill and initiative to improve the overall quality and efficiency of compliance monitoring.”

Approved method SM 4110B seems to have a “verify the MDL at least annually”.

I would say that if another approved method has an annual requirement and I see no significant change in MDLs over several years of running a MDL every 6 months I could back off to once a year to “improve efficiency of compliance monitoring” in my lab.

Bill Hall

NH ELAP

(603) 271-2998

From: Touet, Lisa (DEP) [mailto:[Ex. 6 - Personal Privacy](#)]
Sent: Monday, October 16, 2017 3:17 PM
To: Hall, Bill; DiMattei, Steve; Jamison, Jennifer
Cc: [Ex. 6 - Personal Privacy](#); Kotuli, Jenna (DEP); [Ex. 6 - Personal Privacy](#) Jones, Dermot; 'Schlossberg, Philip'; Croteau, Tyler; George Mills ([Ex. 6 - Personal Privacy](#)); KWong, Ellie; Jefferies, Ann
Subject: RE: NECO Conference Call Thursday October 19th

Technical Notes for Drinking Water.

“Although “must” can be argued to be a stronger word than “should” in requiring adherence to method procedures, some approved procedures use these terms interchangeably.”

From: Hall, Bill [Ex. 6 - Personal Privacy]
Sent: Monday, October 16, 2017 2:57 PM
To: Touet, Lisa (DEP); DiMattei, Steve; Jamison, Jennifer
Cc: [Ex. 6 - Personal Privacy] OV; Kotuli, Jenna (DEP); [Ex. 6 - Personal Privacy] Jones, Dermot; 'Schlossberg, Philip'; Croteau, Tyler; George Mills ([Ex. 6 - Personal Privacy] Kwong, Ellie; Jefferies, Ann
Subject: RE: NECO Conference Call Thursday October 19th

From 300.0...

MDLs should be determined every six months, when a new operator begins work or whenever there is a significant change in the background or instrument response.

How do you define "should"?

"Should" implies an option to me or the writer needed to use the word "shall".

Has the EPA defined the word "should" in writing?

Bill Hall

NH ELAP

Ex. 6 - Personal Privacy

From: Touet, Lisa (DEP) [Ex. 6 - Personal Privacy]
Sent: Monday, October 16, 2017 2:43 PM

To: DiMattei, Steve; Jamison, Jennifer

Cc: [Ex. 6 - Personal Privacy], Kotuli, Jenna (DEP); [Ex. 6 - Personal Privacy] Jones, Dermot; Schlossberg, Philip; Hall, Bill; Croteau, Tyler; George [Ex. 6 - Personal Privacy] Kwong, Ellie; Jefferies, Ann

Subject: RE: NECO Conference Call Thursday October 19th

For the MUR discussion...a number of the EPA Methods (e.g. 300 series) include determination of the MDL on a six month basis, instead of annually. How does the Drinking Water Program's guidance account for this? If a lab uses the "new" Appendix B procedures to determine MDL would they be OK if the MDL was recalculated annually, instead of every 6 months?

Lisa

Lisa Touet

Acting Director,

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<http://www.mass.gov/eea/agencies/massdep/water/drinking/certified-laboratories.html>

From: DiMattei, Steve [mailto:DiMattei.Steve@epa.gov]

Sent: Wednesday, October 11, 2017 2:58 PM

To: Jamison, Jennifer

Cc: [Ex. 6 - Personal Privacy] Touet, Lisa (DEP); Kotuli, Jenna (DEP); [Ex. 6 - Personal Privacy]
Jones, Dermot; 'Schlossberg, Philip'; Hall, Bill; [Ex. 6 - Personal Privacy] George Mills
[Ex. 6 - Personal Privacy] Kwong, Ellie; Jettres, Allen

Subject: NECO Conference Call Thursday October 19th

Folks,

Our next call is only about a week away. We can discuss the MUR, and anything else you want. Please send your agenda items to Jennifer, and I'll get a conference call line setup for us.

Thanks,

Stephen DiMattei

USEPA Region 1 – OEME/EQA

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